From: Turner, Philip
To: Moore, Gary
Subject: RE: PCB Aroclor vs Congener Analysis
Date: Thursday, January 25, 2018 4:00:45 PM

Yes, I agree.

Phil

From: Moore, Gary
Sent: Thursday, January 25, 2018 10:08 AM
To: Turner, Philip <Turner.Philip@epa.gov>
Subject: FW: PCB Aroclor vs Congener Analysis

Phil:

See the response below from Mark and my emails to them about this issue.

Let me know if you agree.

Thanks
Gary Moore

From: Sprenger, Mark
Sent: Tuesday, January 23, 2018 7:14 AM
To: Moore, Gary <Moore.Gary@epa.gov>; Greenberg, Marc <Greenberg.Marc@epa.gov>
Subject: RE: PCB Aroclor vs Congener Analysis

Gary,

Sorry for the delay.

Sort answer: no….if you are doing an action and you have an established remediation level (1 ppm or something else) and that is an acceptable action (because of cost and or other reasons); then there is no reason to do more costly and time consuming analyses.

Congener analyses are justified if you are doing a risk assessment and believe that by doing the congener analyses you can refine (raise) the default remediation goal. As you probably know, there are a number of different ways of doing congener analyses, from doing the full 219 compounds to all the co-planers and/or the homologs (by number of chlorine atoms); each of those has a reason for doing it all related to either risk or identification of source or other detail question.

If you need to defend the decision…go back to DQOs … why are you collecting the additional data?

If you need more than this let me know, I'm guessing you just wanted the "no" but I felt that some context was need, but I do not know if someone is asking you to do the additional work.

mark

From: Moore, Gary
Sent: Friday, January 19, 2018 12:50 PM
To: Sprenger, Mark <Sprenger.Mark@epa.gov>; Greenberg, Marc <Greenberg.Marc@epa.gov>
Subject: PCB Aroclor vs Congener Analysis

Mark/Marc:

I have two sites that I will be doing Removal Assessments on in early spring (late Feb/March). I have done PCB sites before and only did the Aroclor analyses. The cleanup level used was < 1 mg/kg Total PCBs (based upon Aroclor Analysis). My sampling was not for performing a risk assessment but solely to cleanup determination.

Is there a reason for me to do the Congener Analyses?

Henryetta Iron and Metal: Metal salvage yard that limited sampling has shown Aroclors on site and within residential properties downgradient.

Frank J. Doyle Salvage: Transformer Salvage facility that has significant PCB contamination on-site and offsite within residential properties.

Thanks for your assistance.

Gary W. Moore (6SF-ER)
Federal On-Scene Coordinator
U.S EPA Region 6
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733
Cell: 214.789.1627
moore.gary@epa.gov